

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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BARBARA OLSEN, DONALD OLSEN, SR.,  
DONALD OLSEN, JR., and LONG ISLAND  
HOUSING SERVICES, INC.,

Civil Action No.  
09 4283 (LW) (ETB)

Plaintiffs,

v.

**PLAINTIFFS  
PROPOSED VOIR  
DIRE QUESTIONS**

STARK HOMES, INC. D/B/A GLENWOOD VILLAGE,  
and BRIAN STARK,

Defendants,  
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In accordance with Federal Rule of Civil Procedure 47, the local rules of the Eastern District of New York and Judge Wexler's specific practices, plaintiff Long Island Housing Services, Inc. (LIHS) respectfully submits the following proposed questions for use during voir dire:

1. Have you had first-hand experience interacting with individuals with physical disability?
2. Have you had first-hand experience interacting with individuals with mental disability?
3. Do you have any family or close friends who would be classified as a person with a mental or physical disability?
4. Do you believe, in general, that a person with a mental disability is significantly more, or significantly less, impaired than a person with a physical disability?

5. Do you believe that a person with a mental disability is likely to be more dangerous than a person without a mental disability?
6. Have you had experience working as a landlord or property manager?
7. Have you participated, as a landlord, in an eviction proceeding?
8. Have you had experience, as a landlord, with an allegation of unlawful discrimination?
9. Have you, as a landlord, rented to members of a protected class, including an individual with disability, or who receives a disability-related income?
10. Have you had experience as a tenant or as an applicant for rental housing?
11. Have you participated, as a tenant, in an eviction proceeding?
12. Have you experienced unfairness or discrimination in the application process for rental housing?
13. Have you had problems with a landlord in the past?
14. Have you had problems with a neighbor in the past?
15. Have you had problems or conflicts with an individual with mental or physical disability in the past?
16. Do you have experience as a real estate broker, real estate sales person, or with any other position in the real estate industry?
17. Have you, as an individual with experience in the real estate industry, ever been involved with a complaint for housing discrimination?
18. Have you, as an individual with experience in the real estate industry, ever heard stories related to claims of housing discrimination?

19. Have you ever received training that dealt with issues of housing discrimination?
20. Do you have any strongly held views on civil rights?
21. Do you believe that tenants receive too many protections under the law?
22. Do you feel that individuals with disability are afforded too many benefits or protections under the law?
23. Do you believe that civil rights laws are too expansive and regulate too much individual private conduct?
24. Do you believe that civil rights laws are utilized too frequently to bring lawsuits?
25. Would you feel uncomfortable around or object to a person with a mental disability moving next door to them?
26. Would you disapprove of, feel uncomfortable with, or object to the construction of a group home for individuals with mental disability in your neighborhood?
27. Would you rent or buy a home in a neighborhood that has a group home for individuals with mental disability?
28. If you were renting or buying a home, would you want to know if an individual with a mental disability lived nearby?
29. Do you have any experience as an applicant, owner, manager, or real estate agent in dealing with 55 and older communities, their rules and regulations?
30. Have you ever heard the terms reasonable accommodation or reasonable modification?

31. Do you think that rules should applied rigidly, independent of the  
circumstances of any given individual?
32. Have you had any experience with any allegation, formal or informal, of  
housing discrimination?
33. Have you had any experience with any allegation, formal or informal, of  
discrimination?
34. Do you have any children?
35. Do you have any adult children that have or still live with you?
36. Have you ever served as a caretaker for a family member or close friend?
37. Have you ever worked in a caretaker capacity?

Plaintiff respectfully requests an opportunity to present these questions to the jury pool along with any such additional or follow-up questions that would be deemed appropriate from the answers provided.

**Date:** August 30, 2012



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